

Gedicks, Ann Elizabeth

From: Robert Sanders [rsanders@youngwilliams.com]
Sent: Monday, March 30, 2009 5:55 PM
To: Xidis, Claire; Jorgensen, Jay T.; Jaromin, Michelle; ajsiegel@hhlaw.com; bblakemore@bullock-blakemore.com; bchadick@bassettlawfirm.com; bfreeman@cwlaw.com; bjones@faegre.com; Narwold, Bill; bryan.burns@tyson.com; cdolan@faegre.com; Charles.Moulton@arkansasag.gov; cmerkes@mhla-law.com; ctucker@rhodesokla.com; daniel.lennington@oag.ok.gov; david@cgmlawok.com; dberlin@levberlin.com; dchoate@fec.net; dehrich@faegre.com; dmann@mckennalong.com; dpage@riggsabney.com; driggs@riggsabney.com; dustin.darst@kutakrock.com; erin.thompson@kutakrock.com; Baker, Fred; fc_docket@oag.state.ok.us; fevans@lathropgage.com; Fitzpatrick, Fidelma; gchilton@hcdattorneys.com; Todd, Gordon D.; gweeks@bassettlawfirm.com; gwo@owenslawfirmmpc.com; Moll, Ingrid; jelrod@cwlaw.com; jgraves@bassettlawfirm.com; jgriffin@lathropgage.com; jlennart@riggsabney.com; Orent, Jonathan D.; jrainey@titushillis.com; jrussell@fellerssnider.com; jtbanks@hhlaw.com; jtucker@rhodesokla.com; jwisley@cwlaw.com; kctucker@bassettlawfirm.com; kelly_burch@oag.state.ok.us; Kendra.Jones@arkansasag.gov; kklee@faegre.com; klewis@rhodesokla.com; kwilliams@hallestill.com; lbullock@bullock-blakemore.com; leanne.burnett@crowedunlevy.com; Heath, Lee M.; Ward, Liza; mcollins@faegre.com; mgraves@hallestill.com; Hopson, Mark D.; michael.bond@kutakrock.com; Rousseau, Michael; mvahlberg@gablelaw.com; njordan@lightfootlaw.com; nlongwell@mhla-law.com; pbuchwald@ryanwhaley.com; phixon@mhla-law.com; pryan@ryanwhaley.com; rconrad@uschamber.com; rer@owenslawfirmmpc.com; reynolds@titushillis.com; rfunk@cwlaw.com; rgarren@riggsabney.com; richard.ford@crowedunlevy.com; richard.mullins@mcafeetaft.com; rnance@riggsabney.com; robert.george@tyson.com; rredemann@pmrlaw.net; rtl@kiralaw.com; sbartley@mws gw.com; sgentry@riggsabney.com; sjantzen@ryanwhaley.com; smcdaniel@mhla-law.com; Steve Williams; sweaver@riggsabney.com; Green, Thomas C.; terry@thewestlawfirm.com; thill@rhodesokla.com; trevor_hammons@oag.state.ok.us; twalker@faegre.com; Webster, Timothy K.; vbronson@cwlaw.com; waddell@fec.net; wbassett@bassettlawfirm.com; wcxo@lightfootlaw.com; tcoble@rhodesokla.com

Subject: RE: State of Oklahoma v. Tyson

Claire,

Speaking only for Cal-Maine, as things stand right now we will not be able to cover the April 3 deposition. Cal-Maine has three attorneys of record. On April 3, I will be flying to Jackson after taking Jon Craig's deposition on the 2nd. I will then drive to Baton Rouge to meet with Wayne Grip that evening in preparation for his 8:00 a.m. Saturday morning (4/4) deposition. Bob Redemann, CM's local counsel, is deposing Dr. Wilkinson on April 3. The third attorney of record, Steve Williams, in my office, will be out of state for the expected arrival of his first grandchild. Cal-Maine has no one with any experience on the case available for this deposition. Cal-Maine requests your consideration in rescheduling the deposition.

Bob Sanders

From: Xidis, Claire [mailto:cxidis@motleyrice.com]
Sent: Monday, March 30, 2009 4:05 PM
To: Jorgensen, Jay T.; Jaromin, Michelle; ajsiegel@hhlaw.com; bblakemore@bullock-blakemore.com; bchadick@bassettlawfirm.com; bfreeman@cwlaw.com; bjones@faegre.com; Narwold, Bill; bryan.burns@tyson.com; cdolan@faegre.com; Charles.Moulton@arkansasag.gov; cmerkes@mhla-law.com; ctucker@rhodesokla.com; daniel.lennington@oag.ok.gov; david@cgmlawok.com; dberlin@levberlin.com; dchoate@fec.net; dehrich@faegre.com; dmann@mckennalong.com; dpage@riggsabney.com; driggs@riggsabney.com; dustin.darst@kutakrock.com; erin.thompson@kutakrock.com; Baker, Fred; fc_docket@oag.state.ok.us; fevans@lathropgage.com; Fitzpatrick, Fidelma; gchilton@hcdattorneys.com; Todd, Gordon D.; gweeks@bassettlawfirm.com; gwo@owenslawfirmmpc.com; Moll, Ingrid; jelrod@cwlaw.com;

jgraves@bassettlawfirm.com; jgriffin@lathropgage.com; jlennart@riggsabney.com; Orent, Jonathan D.; jrailey@titushillis.com; jrussell@fellerssnider.com; jtbanks@hhlaw.com; jtucker@rhodesokla.com; jwisley@cwlaw.com; ktucker@bassettlawfirm.com; kelly_burch@oag.state.ok.us; Kendra.Jones@arkansasag.gov; kkleee@faegre.com; klewis@rhodesokla.com; kwilliams@hallestill.com; lbullock@bullock-blakemore.com; leanne.burnett@crowedunlevy.com; Heath, Lee M.; Ward, Liza; mcollins@faegre.com; mgraves@hallestill.com; Hopson, Mark D.; michael.bond@kutakrock.com; Rousseau, Michael; mvahlberg@gablelaw.com; njordan@lightfootlaw.com; nlongwell@mhla-law.com; pbuchwald@ryanwhaley.com; phixon@mhla-law.com; pryan@ryanwhaley.com; rconrad@uschamber.com; rer@owenslawfirm.com; reynolds@titushillis.com; rfunk@cwlaw.com; rgarren@riggsabney.com; richard.ford@crowedunlevy.com; richard.mullins@mcafeetaft.com; rnance@riggsabney.com; robert.george@tyson.com; rredemann@pmrlaw.net; Robert Sanders; rtl@kiralaw.com; sbartley@mwsqw.com; sgentry@riggsabney.com; sjantzen@ryanwhaley.com; smcdaniel@mhla-law.com; Steve Williams; sweaver@riggsabney.com; Green, Thomas C.; terry@thewestlawfirm.com; thill@rhodesokla.com; trevor_hammons@oag.state.ok.us; twalker@faegre.com; Webster, Timothy K.; vbronson@cwlaw.com; waddell@fec.net; wbassett@bassettlawfirm.com; wcox@lightfootlaw.com; tcoble@rhodesokla.com

Subject: RE: State of Oklahoma v. Tyson

Jay-

I'm not categorically refusing to discuss this with you. You emailed me on Saturday unilaterally demanding that we change the date of the deposition to accommodate the schedules of unidentified individuals who have not communicated one word about this deposition since it was noticed weeks ago. The notice was served on Defendants March 11, and if Defendants were interested in this deposition of a non-party subpoenaed by the State, it was not incumbent upon the State to invite them to discuss the deposition, but the Defendants' responsibility to communicate that they were interested in being involved.

You asked to change the date of the deposition in your email, and I simply explained why that is not possible and offered to try to make a phone available to facilitate participation by Defendants. I also explained that the date was selected because that is the only date that worked for the State, the deponent, and counsel for USPE. The fact that extenuating circumstances may have forced the parties to enter into some limited agreements for other specific depositions does not mean that this situation automatically warrants a deviation from the Court's (now very clear) deadline for the discovery cut-off.

Among the dozens of attorneys working on this case on behalf of the Defendants, I'm sure there is someone who can join the deposition on Friday by phone. Are you representing that Defendants really do not have ANY counsel that can participate in this deposition, even by phone? You have not even specifically identified what Defendants' conflict or problem with availability really is, yet you expect the State to reschedule this deposition at your convenience. This is an unreasonable request.

Claire Xidis | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 | cxidis@motleyrice.com
o. 843.216.9251 | c. 843.834.4747 | f. 843.216.9450

From: Jorgensen, Jay T. [mailto:jjorgensen@sidley.com]

Sent: Monday, March 30, 2009 1:44 PM

To: Xidis, Claire; Jaromin, Michelle; ajsiegel@hhlaw.com; bblakemore@bullock-blakemore.com; bchadick@bassettlawfirm.com; bfreeman@cwlaw.com; bjones@faegre.com; Narwold, Bill; bryan.burns@tyson.com; cdolan@faegre.com; Charles.Moulton@arkansasag.gov; cmerkes@mhla-law.com; ctucker@rhodesokla.com; daniel.lennington@oag.ok.gov; david@cgmlawok.com; dberlin@levberlin.com; dchoate@fec.net; dehrich@faegre.com; dmenn@mckennalong.com; dpage@riggsabney.com; driggs@riggsabney.com; dustin.darst@kutakrock.com; erin.thompson@kutakrock.com; Baker, Fred; fc_docket@oag.state.ok.us; fevans@lathropgage.com; Fitzpatrick, Fidelma; gchilton@hcdattorneys.com; Todd, Gordon D.; gweeks@bassettlawfirm.com; gwo@owenslawfirm.com; Moll, Ingrid; jelrod@cwlaw.com; jgraves@bassettlawfirm.com; jgriffin@lathropgage.com; jlennart@riggsabney.com; Orent, Jonathan D.; jrailey@titushillis.com; jrussell@fellerssnider.com; jtbanks@hhlaw.com; jtucker@rhodesokla.com;

jwisley@cwlaw.com; kctucker@bassettlawfirm.com; kelly_burch@oag.state.ok.us;
 Kendra.Jones@arkansasag.gov; kkleee@faegre.com; klewis@rhodesokla.com; kwilliams@hallestill.com;
 lbullock@bullock-blakemore.com; leanne.burnett@crowedunlevy.com; Heath, Lee M.; Ward, Liza;
 mcollins@faegre.com; mgraves@hallestill.com; Hopson, Mark D.; michael.bond@kutakrock.com; Rousseau,
 Michael; mvahlberg@gablelaw.com; njordan@lightfootlaw.com; nlongwell@mhla-law.com;
 pbuchwald@ryanwhaley.com; phixon@mhla-law.com; pryan@ryanwhaley.com; rconrad@uschamber.com;
 rer@owenslawfirm.com; reynolds@titushillis.com; rfunk@cwlaw.com; rgarren@riggsabney.com;
 richard.ford@crowedunlevy.com; richard.mullins@mcafeetaft.com; rnance@riggsabney.com;
 robert.george@tyson.com; rredemann@pmrlaw.net; rsanders@youngwilliams.com; rtl@kiralaw.com;
 sbartley@mws gw.com; sgentry@riggsabney.com; sjantzen@ryanwhaley.com; smcdaniel@mhla-law.com;
 steve.williams@youngwilliams.com; sweaver@riggsabney.com; Green, Thomas C.; terry@thewestlawfirm.com;
 thill@rhodesokla.com; trevor_hammons@oag.state.ok.us; twalker@faegre.com; Webster, Timothy K.;
 vbronson@cwlaw.com; waddell@fec.net; wbassett@bassettlawfirm.com; wcox@lightfootlaw.com;
 tcoble@rhodesokla.com

Subject: RE: State of Oklahoma v. Tyson

Claire,

Defendants were aware that you were negotiating a change from the date that you noticed. I assumed you would include us in that discussion, but you did not. Our request to be included in the scheduling is not unreasonable. I regret that you have categorically refused to discuss scheduling this deposition at a time that works for Defendants. As you know, the parties have previously agreed to take approximately 5 depositions beyond the April 16 date. I don't see why this deposition is different.

Please let me know today if you are willing to reconsider. Otherwise, Defendants will be forced to file a motion to quash.

Jay

From: Xidis, Claire [mailto:cxidis@motleyrice.com]

Sent: Monday, March 30, 2009 9:49 AM

To: Jorgensen, Jay T.; Jaromin, Michelle; ajsiegel@hhlaw.com; bblakemore@bullock-blakemore.com;
 bchadick@bassettlawfirm.com; bfreeman@cwlaw.com; bjones@faegre.com; Narwold, Bill;
 bryan.burns@tyson.com; cdolan@faegre.com; Charles.Moulton@arkansasag.gov; cmerkes@mhla-law.com;
 ctucker@rhodesokla.com; daniel.lennington@oag.ok.gov; david@cgmlawok.com; dberlin@levberlin.com;
 dchoate@fec.net; dehrich@faegre.com; dmann@mckennalong.com; dpage@riggsabney.com;
 driggs@riggsabney.com; dustin.darst@kutakrock.com; erin.thompson@kutakrock.com; Baker, Fred;
 fc_docket@oag.state.ok.us; fevans@lathropgage.com; Fitzpatrick, Fidelma; gchilton@hcdattorneys.com;
 Todd, Gordon D.; gweeks@bassettlawfirm.com; gwo@owenslawfirm.com; Moll, Ingrid;
 jelrod@cwlaw.com; jgraves@bassettlawfirm.com; jgriffin@lathropgage.com; jlennart@riggsabney.com;
 Orent, Jonathan D.; jrailey@titushillis.com; jrussell@fellerssnider.com; jtbanks@hhlaw.com;
 jtucker@rhodesokla.com; jwisley@cwlaw.com; kctucker@bassettlawfirm.com;
 kelly_burch@oag.state.ok.us; Kendra.Jones@arkansasag.gov; kkleee@faegre.com; klewis@rhodesokla.com;
 kwilliams@hallestill.com; lbullock@bullock-blakemore.com; leanne.burnett@crowedunlevy.com; Heath, Lee
 M.; Ward, Liza; mcollins@faegre.com; mgraves@hallestill.com; Hopson, Mark D.;
 michael.bond@kutakrock.com; Rousseau, Michael; mvahlberg@gablelaw.com; njordan@lightfootlaw.com;
 nlongwell@mhla-law.com; pbuchwald@ryanwhaley.com; phixon@mhla-law.com; pryan@ryanwhaley.com;
 rconrad@uschamber.com; rer@owenslawfirm.com; reynolds@titushillis.com; rfunk@cwlaw.com;
 rgarren@riggsabney.com; richard.ford@crowedunlevy.com; richard.mullins@mcafeetaft.com;
 rnance@riggsabney.com; robert.george@tyson.com; rredemann@pmrlaw.net;
 rsanders@youngwilliams.com; rtl@kiralaw.com; sbartley@mws gw.com; sgentry@riggsabney.com;
 sjantzen@ryanwhaley.com; smcdaniel@mhla-law.com; steve.williams@youngwilliams.com;
 sweaver@riggsabney.com; Green, Thomas C.; terry@thewestlawfirm.com; thill@rhodesokla.com;
 trevor_hammons@oag.state.ok.us; twalker@faegre.com; Webster, Timothy K.; vbronson@cwlaw.com;
 waddell@fec.net; wbassett@bassettlawfirm.com; wcox@lightfootlaw.com; tcoble@rhodesokla.com

Subject: RE: State of Oklahoma v. Tyson

Jay,

Defendants received a copy of the USPE subpoena on March 11, and never communicated anything about scheduling this deposition or wanting to be involved until your Saturday, March 28 email below.

As you are aware from the motion filed by the State on Friday, the State's position is that the discovery deadline has not been extended for any purpose other than the depositions of Defendants' experts disclosed on March 31.

April 3 is the one date that worked for the State, the USPE attorney, and the deponent before the close of discovery on April 16. Thus, we cannot change the date. If it facilitates things for the Defendants, I'm sure we can make a telephone available at the deposition if any defense counsel would like to participate by phone.

Claire Xidis | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 | cxidis@motleyrice.com
o. 843.216.9251 | c. 843.834.4747 | f. 843.216.9450

From: Jorgensen, Jay T. [<mailto:jjorgensen@sidley.com>]

Sent: Saturday, March 28, 2009 11:21 AM

To: Jaromin, Michelle; ajsiegel@hhlaw.com; bblakemore@bullock-blakemore.com; bchadick@bassettlawfirm.com; bfreeman@cwlaw.com; bjones@faegre.com; Narwold, Bill; bryan.burns@tyson.com; cdolan@faegre.com; Charles.Moulton@arkansasag.gov; cmerkes@mhla-law.com; ctucker@rhodesokla.com; daniel.lennington@oag.ok.gov; david@cgmlawok.com; dberlin@levberlin.com; dchoate@fec.net; dehrich@faegre.com; dmann@mckennalong.com; dpage@riggsabney.com; driggs@riggsabney.com; dustin.darst@kutakrock.com; erin.thompson@kutakrock.com; Baker, Fred; fc_docket@oag.state.ok.us; fevans@lathropgpage.com; Fitzpatrick, Fidelma; gchilton@hcdattorneys.com; Todd, Gordon D.; gweeks@bassettlawfirm.com; gwo@owenslawfirmmpc.com; Moll, Ingrid; jelrod@cwlaw.com; jgraves@bassettlawfirm.com; jgriffin@lathropgpage.com; jlennart@riggsabney.com; Orent, Jonathan D.; jrailey@titushillis.com; jruessell@fellerssnider.com; jtbanks@hhlaw.com; jtucker@rhodesokla.com; jwisley@cwlaw.com; kctucker@bassettlawfirm.com; kelly_burch@oag.state.ok.us; Kendra.Jones@arkansasag.gov; klee@faegre.com; kewis@rhodesokla.com; kwilliams@hallestill.com; lbullock@bullock-blakemore.com; leanne.burnett@crowedunlevy.com; Heath, Lee M.; Ward, Liza; mcollins@faegre.com; mgraves@hallestill.com; Hopson, Mark D.; michael.bond@kutakrock.com; Rousseau, Michael; mvaahlberg@gablelaw.com; njordan@lightfootlaw.com; nlongwell@mhla-law.com; pbuchwald@ryanwhaley.com; phixon@mhla-law.com; pryan@ryanwhaley.com; rconrad@uschamber.com; rer@owenslawfirmmpc.com; reynolds@titushillis.com; rfunk@cwlaw.com; rgarren@riggsabney.com; richard.ford@crowedunlevy.com; richard.mullins@mcafeetaft.com; rnance@riggsabney.com; robert.george@tyson.com; rredemann@pmrlaw.net; rsanders@youngwilliams.com; rtl@kiralaw.com; sbartley@mwsqw.com; sgentry@riggsabney.com; sjantzen@ryanwhaley.com; smcdaniel@mhla-law.com; steve.williams@youngwilliams.com; sweaver@riggsabney.com; Green, Thomas C.; terry@thewestlawfirm.com; thill@rhodesokla.com; trevor_hammons@oag.state.ok.us; twalker@faegre.com; Webster, Timothy K.; vbronson@cwlaw.com; waddell@fec.net; wbassett@bassettlawfirm.com; wcox@lightfootlaw.com; tcoble@rhodesokla.com

Cc: Xidis, Claire

Subject: RE: State of Oklahoma v. Tyson

Claire,

Defendants would like to be included in the re-scheduling of this deposition. The lawyers who are working on this can't make it on the 2nd or 3rd, but now that Judge Cleary has extended the discovery deadline we propose the week of April 20-24.

Jay

From: Jaromin, Michelle [mailto:mjaromin@motleyrice.com]
Sent: Friday, March 27, 2009 10:19 AM
To: ajsiegel@hhlaw.com; bblakemore@bullock-blakemore.com; bchadick@bassettlawfirm.com; bfreeman@cwlaw.com; bjones@faegre.com; Narwold, Bill; bryan.burns@tyson.com; cdolan@faegre.com; Charles.Moulton@arkansasag.gov; cmerkes@mhla-law.com; ctucker@rhodesokla.com; daniel.lennington@oag.ok.gov; david@cgmlawok.com; dberlin@levberlin.com; dchoate@fec.net; dehrich@faegre.com; dmann@mckennalong.com; dpage@riggsabney.com; driggs@riggsabney.com; dustin.darst@kutakrock.com; erin.thompson@kutakrock.com; Baker, Fred; fc_docket@oag.state.ok.us; fevans@lathropgage.com; Fitzpatrick, Fidelma; gchilton@hcdattorneys.com; Todd, Gordon D.; gweeks@bassettlawfirm.com; gwo@owenslawfirmmpc.com; Moll, Ingrid; jelrod@cwlaw.com; jgraves@bassettlawfirm.com; jgriffin@lathropgage.com; Jorgensen, Jay T.; jlennart@riggsabney.com; Orent, Jonathan D.; jrainey@titushillis.com; jrussell@fellerssnider.com; jtbanks@hhlaw.com; jtucker@rhodesokla.com; jwisley@cwlaw.com; kctucker@bassettlawfirm.com; kelly_burch@oag.state.ok.us; Kendra.Jones@arkansasag.gov; kkleee@faegre.com; klewis@rhodesokla.com; kwilliams@hallestill.com; lbullock@bullock-blakemore.com; leanne.burnett@crowedunlevy.com; Heath, Lee M.; Ward, Liza; mcollins@faegre.com; mgraves@hallestill.com; Hopson, Mark D.; michael.bond@kutakrock.com; Rousseau, Michael; mvahlberg@gablelaw.com; njordan@lightfootlaw.com; nlongwell@mhla-law.com; pbuchwald@ryanwhaley.com; phixon@mhla-law.com; pryan@ryanwhaley.com; rconrad@uschamber.com; rer@owenslawfirmmpc.com; reynolds@titushillis.com; rfunk@cwlaw.com; rgarren@riggsabney.com; richard.ford@crowedunlevy.com; richard.mullins@mcafeetaft.com; rnance@riggsabney.com; robert.george@tyson.com; rredemann@pmrlaw.net; rsanders@youngwilliams.com; rtl@kiralaw.com; sbartley@mwsgw.com; sgentry@riggsabney.com; sjantzen@ryanwhaley.com; smcdaniel@mhla-law.com; steve.williams@youngwilliams.com; sweaver@riggsabney.com; Green, Thomas C.; terry@thewestlawfirm.com; thill@rhodesokla.com; trevor_hammons@oag.state.ok.us; twalker@faegre.com; Webster, Timothy K.; vbronson@cwlaw.com; waddell@fec.net; wbassett@bassettlawfirm.com; wcox@lightfootlaw.com; tcoble@rhodesokla.com
Cc: Xidis, Claire
Subject: FW: State of Oklahoma v. Tyson

Please be advised that the deposition of U.S. Poultry & Egg noticed in the attached subpoena will go forward on April 3rd at 9:00 am, rather than April 2nd as set forth in the subpoena.

Michelle M. Jaromin | Paralegal | Motley Rice LLC
 28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
 o. 843.216.9477 | f. 843.216.9450 | mjaromin@motleyrice.com

From: Jaromin, Michelle **On Behalf Of** Xidis, Claire
Sent: Wednesday, March 11, 2009 3:41 PM
To: 'ajsiegel@hhlaw.com'; 'bblakemore@bullock-blakemore.com'; 'bchadick@bassettlawfirm.com'; 'bfreeman@cwlaw.com'; 'bjones@faegre.com'; Narwold, Bill; 'bryan.burns@tyson.com'; 'cdolan@faegre.com'; 'Charles.Moulton@arkansasag.gov'; 'cmerkes@mhla-law.com'; 'ctucker@rhodesokla.com'; 'daniel.lennington@oag.ok.gov'; 'david@cgmlawok.com'; 'dberlin@levberlin.com'; 'dchoate@fec.net'; 'dehrich@faegre.com'; 'dmann@mckennalong.com'; 'dpage@riggsabney.com'; 'driggs@riggsabney.com'; 'dustin.darst@kutakrock.com'; 'erin.thompson@kutakrock.com'; Baker, Fred; 'fc_docket@oag.state.ok.us'; 'fevans@lathropgage.com'; Fitzpatrick, Fidelma; 'gchilton@hcdattorneys.com'; 'gtodd@sidley.com'; 'gweeks@bassettlawfirm.com'; 'gwo@owenslawfirmmpc.com'; Moll, Ingrid; 'jelrod@cwlaw.com'; 'jgraves@bassettlawfirm.com'; 'jgriffin@lathropgage.com';

'jjorgensen@sidley.com'; 'jlennart@riggsabney.com'; Orent, Jonathan D.; 'jrainey@titushillis.com';
 'jrussell@fellerssnider.com'; 'jtbanks@hhlaw.com'; 'jtucker@rhodesokla.com';
 'jwisley@cwlaw.com'; 'kctucker@bassetlawfirm.com'; 'kelly_burch@oag.state.ok.us';
 'Kendra.Jones@arkansasag.gov'; 'kkleee@faegre.com'; 'klewis@rhodesokla.com';
 'kwilliams@hallestill.com'; 'lbullock@bullock-blakemore.com'; 'leanne.burnett@crowedunlevy.com';
 Heath, Lee M.; Ward, Liza; 'mcollins@faegre.com'; 'mgraves@hallestill.com';
 'mhopson@sidley.com'; 'michael.bond@kutakrock.com'; Rousseau, Michael;
 'mvahlberg@gablelaw.com'; 'njordan@lightfootlaw.com'; 'nlongwell@mhla-law.com';
 'pbuchwald@ryanwhaley.com'; 'phixon@mhla-law.com'; 'pryan@ryanwhaley.com';
 'rconrad@uschamber.com'; 'rer@owenslawfirm.com'; 'reynolds@titushillis.com';
 'rfunk@cwlaw.com'; 'rgarren@riggsabney.com'; 'richard.ford@crowedunlevy.com';
 'richard.mullins@mcafeetaft.com'; 'rnance@riggsabney.com'; 'robert.george@tyson.com';
 'rredemann@pmrlaw.net'; 'rsanders@youngwilliams.com'; 'rtl@kiralaw.com';
 'sbartley@mwsgw.com'; 'sgentry@riggsabney.com'; 'sjantzen@ryanwhaley.com';
 'smcdaniel@mhla-law.com'; 'steve.williams@youngwilliams.com'; 'sweaver@riggsabney.com';
 'tcgreen@sidley.com'; 'terry@thewestlawfirm.com'; 'thill@rhodesokla.com';
 'trevor_hammons@oag.state.ok.us'; 'twalker@faegre.com'; 'twebster@sidley.com';
 'vbronson@cwlaw.com'; 'waddell@fec.net'; 'wbassett@bassetlawfirm.com';
 'wcox@lightfootlaw.com'

Cc: Jaromin, Michelle; Xidis, Claire
Subject: State of Oklahoma v. Tyson

Attached please find a Subpoena and Notice of Deposition to the U.S. Poultry & Egg Association, as well as the related Certificate of Service.

Michelle M. Jaromin | Paralegal | Motley Rice LLC
 28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
 o. 843.216.9477 | f. 843.216.9450 | mjaromin@motleyrice.com

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney-client privileged and confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies--electronic, paper or otherwise--which you may have of this communication.

 IRS Circular 230 Disclosure: To comply with certain U.S. Treasury regulations, we inform you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this communication, including attachments, was not intended or written to be used, and cannot be used, by any taxpayer for the purpose of avoiding any penalties that may be imposed on such taxpayer by the Internal Revenue Service. In addition, if any such tax advice is used or referred to by other parties in promoting, marketing or recommending any partnership or other entity, investment plan or arrangement, then (i) the advice should be construed as written in connection with the promotion or marketing by others of the transaction(s) or matter(s) addressed in this communication and (ii) the taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor.

This e-mail is sent by a law firm and may contain information that is privilege

If you are not the intended recipient, please delete the e-mail and any attachments immediately.

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney-client privileged and confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies--electronic, paper or otherwise--which you may have of this communication.

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney-client privileged and confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies--electronic, paper or otherwise--which you may have of this communication.